

1 *[Stipulating parties listed on signature page]*
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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

11 In re: CATHODE RAY TUBE (CRT)
12 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-JST (N.D. Cal)

MDL No. 1917

13 This Document Relates to:

14 *Sears, Roebuck and Co. and Kmart Corp. v.*
15 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv-
16 05514

**STIPULATION REGARDING MOTION
FOR ADOPTION OF PROCEDURE TO
RESOLVE PROTECTIVE ORDER
ISSUES PRETRIAL**

**[Joint Administrative Motion and
[Proposed] Order to Show Cause Filed
Concurrently Herewith]**

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18 Judge: Hon. Jon S. Tigar
19 Court: Courtroom 9, 19th Floor
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MDL No. 1917
Master No. 3:07-cv-05944-JST

STIPULATION REGARDING MOTION FOR ADOPTION OF PROCEDURE TO RESOLVE PROTECTIVE ORDER
ISSUES PRETRIAL

1 WHEREAS, Plaintiffs Sears, Roebuck and Co. and Kmart Corporation (“Plaintiffs”) are
2 the only remaining plaintiffs in Case No. 11-cv-05514 (“*Sears/Kmart* case”);

3 WHEREAS, LG Electronics, Inc. (“LGE”) is the only remaining defendant in the
4 *Sears/Kmart* case;

5 WHEREAS, the trial in the *Sears/Kmart* case is set for January 9, 2017, *see* ECF No.
6 4658;

7 WHEREAS, both parties are aware of the strong presumption in favor of a public trial;

8 PURSUANT TO LOCAL RULE 7-12, PLAINTIFFS AND LGE, BY AND THROUGH
9 THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE AS FOLLOWS:

10 1. The Protective Order Procedure set forth in the Proposed Order to Show Cause
11 Regarding Motion for Adoption of Procedure to Resolve Protective Order Issues Pretrial (the
12 “Proposed Order to Show Cause”), filed concurrently herewith, would efficiently provide notice to
13 entities who have designated protected material in this litigation and offer them an opportunity to
14 request with this Court that their documents remain under seal, while also respecting the strong
15 presumption in favor of a public trial;

16 2. The parties therefore concur, as set forth in the Joint Administrative Motion for
17 Adoption of Procedure to Resolve Protective Order Issues Pretrial, in jointly and respectfully
18 requesting that this Court enter the Proposed Order to Show Cause.

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1 Dated: November 7, 2016

Respectfully submitted,

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23 *Counsel for Plaintiffs Sears, Roebuck and Co. and
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24 Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this
25 document has been obtained from each of the above signatories.
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